

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CASE NO. 21-31948 (MI)

§ **DEBTOR: WASHINGTON
PRIME GROUP INC., *et al.*¹**
§ **JUDGE: MARVIN ISGUR**
§ **COURTROOM DEPUTY:
TYLER LAWS**
§
§

WITNESSES:

1. Any fact or expert witness called by any other Party
2. Any witness listed by any other party;
3. Any rebuttal or impeachment witness.

§ **ATTY'S NAME: Rakhee V. Patel**
§ **ATTY'S PHONE: (214) 745-5250**
§ **TEXAS BAR NO.: 00797213**
§ **DATE: SEPTEMBER 2, 2021**
§ **NATURE OF PROCEEDING:
MOTION TO CONTINUE**
§
§

WITNESS AND EXHIBIT INDEX

EX. NO.	DESCRIPTION	M A R K E D	F F E R E D	O B J E C T	O D M E I T	A D A M I T	D A T A T E	D I T I T E	A I T I T E	A I R O I N	A F T E I L	
1.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 161]											

¹ A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.primeclerk.com/washingtonprime>. The Debtors' service address is 180 East Broad Street, Columbus, Ohio 43215.

EX. NO.	DESCRIPTION	M A R K E D	O F E R E D	O B J E C T	A D M I T	D A T E	A F T R I O N L
2.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 162]						
3.	Additional Attachments Re: <i>Exhibit D to the Disclosure Statement - Liquidation Analysis</i> [Docket No. 218]						
4.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 323]						
5.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 325]						
6.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 334]						
7.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 335]						
8.	Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the (A) Solicitation Procedures, (B) Forms of Ballots and Notices in Connection Therewith, (C) Equity Rights Offering Procedures and Related Materials, and (E) Combined Hearing and Equity Rights Offering Timelines, and (III) Granting Related Relief, Signed on 7/12/2021 [Docket No. 337]						
9.	Chapter 11 Plan of Reorganization Filed by Washington Prime Group Inc. [Docket No. 338]						

EX. NO.	DESCRIPTION	M A R K E D	O F E R E D	O B J E C T	A D M I T	D A T E	A I T R I O N L
10.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 339]						
11.	<i>Notice of Rescheduled Combined Hearing to Approve the Disclosure Statement and Confirm the Plan and Related Dates.</i> Filed by Washington Prime Group Inc. [Docket No. 716]						
12.	<i>Notice of Filing of Plan Supplement</i> [Docket No. 876]						
13.	First Amended Chapter 11 Plan Filed by Washington Prime Group Inc. [Docket No. 893]						
14.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 894]						
15.	Amended Chapter 11 Plan Filed by Washington Prime Group Inc. [Docket No. 909]						
16.	Notice of Disclosure Statement Supplement Relating to the First Amended Joint Chapter 11 Plan of Reorganization of Washington Prime Group Inc., and its Debtor Affiliates. Filed by Washington Prime Group Inc. [Docket No. 914]						

EX. NO.	DESCRIPTION	M A R K E D	O F E R E D	O B J E C T	A D M I T	D A T E	D I T R I O N L
17.	Order (I) Approving the Debtors' Continued Solicitation of the Plan, (II) Conditionally Approving the Adequacy of the Supplemental Disclosure Statement, (III) Approving the Modified Equity Option Procedures, the Common Equity Rights Offering Procedures, and Related Materials, (IV) Modifying Certain Confirmation and Equity Rights Offering Deadlines, and (V) Granting Related Relief, Signed on 8/25/2021 [Docket No. 917]						
18.	Disclosure Statement Filed by Washington Prime Group Inc. [Docket No. 928]						
19.	Stipulation and Agreed Order (I) Rescheduling the Combined Hearing, (II) Extending the Voting, Objection, and Other Combined Hearing Deadlines, and (III) Setting a Discovery and Litigation Schedule for the Official Committee of Equity Security Holders Related to the Combined Hearing [Docket No. 704]						
20.	Any exhibits designated by any other parties in interest						
21.	Any pleadings, reports, exhibits, transcripts, Court orders, or other documents filed in the Debtor's bankruptcy case						
22.	Any impeachment or rebuttal exhibits						

Mountain Special Situations Fund, LLC, Clear Harbor Asset Management, LLC, and Invictus Global Management, LLC reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the hearing and/or in compliance with the Bankruptcy Local Rules and the Orders of this Court. Mountain Special Situations Fund, LLC, Clear Harbor Asset Management, LLC, and Invictus Global Management, LLC also reserves the right to provide any documents that may be amended or supplemented in this Exhibit List to opposing counsel and to this Court as they become available.

DATED: September 1, 2021.

Respectfully submitted,

WINSTEAD PC

By: /s/ Rakhee V. Patel
Rakhee V. Patel
Texas Bar No. 00797213
S.D. Tex. No. 23571
Phillip Lamberson
Texas Bar No. 00794134
S.D. Tex. No. 25823
Jason Enright
Texas Bar No. 24087475
S.D. Tex. No. 3037852
Annmarie Chiarello
Texas Bar No. 24097496
S.D. Tex. No. 2936034
500 Winstead Building
2728 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 745-5400
Facsimile: (214) 745-5390
achiarello@winstead.com

- and -

WINSTEAD PC

Yasmin Atasi
Texas Bar No. 10435150
Sean B. Davis
Texas Bar No. 24069583
S.D. Tex. No. 1048341
Steffen Sowell
Texas Bar No. 24107926
S.D. Tex. No. 3599931
600 Travis Street
Suite 5200
Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400
E-mail: yatasi@winstead.com
E-mail: sbdavis@winstead.com
E-mail: ssowell@winstead.com

**ATTORNEYS FOR MOUNTAIN
SPECIAL SITUATIONS FUND, LLC,
CLEAR HARBOR ASSET
MANAGEMENT, LLC, AND INVICTUS
GLOBAL MANAGEMENT, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2021, a true and correct copy of the foregoing was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case.

/s/ Annmarie Chiarello
One of Counsel